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2-14-02
MFA

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**In the United States District Court for the
Middle District of Pennsylvania**

GREENE/GUILFORD ENVIRONMENTAL
ASSOCIATION, a non-profit corporation incorporated
under the laws of the Commonwealth of Pennsylvania,
CITIZENS FOR PLANNED COMMUNITY GROWTH,
an unincorporated association organized under the laws of
the Commonwealth of Pennsylvania, PAUL B. AMBROSE,
JOHN G. ENDERS, CHARLES F. RAHAUSER,
BETSY RAHAUSER, DOUGLAS A. WARNOCK, U.X
VAGNERINI, THOMAS W. BUNDY, STEPHEN P.
BUCHER, ROGER J. ROBERTSON, JAMES A.
STRITE, JR., DAVID A. GUTHRIE

v.

KEN WYKLE, Administrator, Federal Highway
Administration, ROBERT GATZ, Federal
Highway Administration

and

BRADLEY L. MALLORY, Secretary for
The Department of Transportation, Commonwealth
of Pennsylvania

Defendant-Intervenor

Civ. No. 1:CV-01-0910

(Judge Rambo)

FILED
HARRISBURG, PA

FEB 13 2002

MARY E. D'ANILEA, CLERK
Per 9/8

**PLAINTIFFS' UNOPPOSED MOTION TO EXTEND DEADLINES FOR FILING
DISPOSITIVE MOTIONS TO MARCH 31, 2002**

AND NOW, come the Plaintiffs in the above captioned case, and respectfully
request that this Court grant an extension to the Parties for the filing of their Motions for
Summary Judgment and supporting Briefs to March 31, 2002, for the following reasons:

1. On July 20, 2001, following a case management conference held between the parties, this Court established February 15, 2002 as the deadline for the parties to file dispositive motions.
2. The Defendants produced the Administrative Record on September 28, 2001. The Record consists of twelve boxes of documents.
3. After a review of the documents in the Administrative Record, the Plaintiffs discovered that sixty-one (61) documents, and several categories of documents, were missing from the Administrative Record.
4. On December 13, 2001, the Plaintiffs filed a Motion to Supplement the Administrative Record and for Judicial Notice of Certain Documents, with a supporting Brief.
5. On January 7, 2002, the Defendants and the Intervenor filed an Answer in Opposition to the Plaintiffs' Motion to Supplement the Record.
6. On January 16, 2002, the Plaintiffs filed a Reply to the Defendants' Answer.
7. On February 5, 2002, this Court issued an Order, requiring the Plaintiffs to refile their Brief in support of their Motion to Supplement, with an indexing of the Brief to easily identify the corresponding list of documents in the Motion. This Court established a deadline of February 20, 2002 for the refiling of that Brief.
8. A resolution of the Motion to Supplement is a necessary prerequisite to the Plaintiffs' filing of their Motion for Summary Judgment, as documents omitted from the Record provide support for the Plaintiffs' claims in this case.

9. If documents are supplemented to the Administrative Record, a period of time for the assembling, binding, and production of those documents on all parties - by both parties - will be necessary prior to the filing of the Plaintiffs' Motion for Summary Judgment.

10. The Plaintiffs believe that the extension of the filing deadline to March 31, 2002 would be adequate for the production of those documents and for the integrating of material from those documents into a Motion for Summary Judgment.

11. The Defendants and the Intervenor have concurred in this Motion and have authorized the Plaintiffs to ask this Court to extend the deadline to March 31, 2002, for all Parties to file dispositive motions.

Respectfully Submitted this 11th Day of February, 2002,



Thomas Alan Linzey, Esq.
Supreme Court I.D. #76069
Community Environmental Legal Defense Fund (CELDF)
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Chambersburg, Pennsylvania 17201
(717) 709-0457
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Counsel for the Plaintiffs

CERTIFICATE OF SERVICE OF PROCESS

I, Thomas Linzey, hereby swear and affirm that I have served the accompanying MOTION on the Parties identified below by the following method:

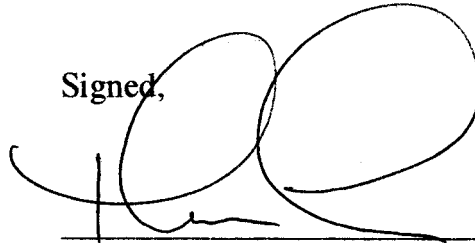
Pre-Paid First Class U.S. Mail

The following individuals were served with the MOTION:

Anne K. Fiorenza, Esq.
Martin Carlson, Esq.
Acting U.S. Attorney for the Middle District of Pennsylvania
Suite 217, Federal Building
228 Walnut Street
Harrisburg, Pennsylvania 17108-1754

Kenda Jo Gardner, Esq.
Office of Chief Counsel
Pennsylvania Department of Transportation
P.O. Box 8212
Harrisburg, Pennsylvania 17105-8212

Signed,

A handwritten signature in black ink, appearing to be 'T. Linzey', written over a horizontal line.

Thomas Alan Linzey, Esq.
Community Environmental Legal Defense Fund (CELDF)
2859 Scotland Road
Chambersburg, Pennsylvania 17201

Counsel for the Plaintiffs

Dated this 11th Day of February, 2002